1 THE HONORABLE MARSHA J. PECHMAN 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 DDSSBOS LLC d/b/a DAV EL/BOSTON Case No. 2:22-cv-00249 MJP 9 COACH, a Massachusetts limited liability STIPULATED MOTION AND ORDER company, 10 EXTENDING TIME FOR DEFENDANT Plaintiff, THE BOEING COMPANY TO MOVE, 11 PLEAD, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT BY 32 DAYS v. 12 AND EXTENDING EARLY CASE THE BOEING COMPANY, a Delaware **DEADLINES** 13 Corporation, 14 Defendant. 15 Pursuant to Local Civil Rules 7(j) and 10(g), Defendant The Boeing Company 16 ("Boeing") and Plaintiff DDSSBOS LLC d/b/a Dav El/Boston Coach ("Dav El") hereby submit 17 this stipulated motion to extend Boeing's time to move, plead, or otherwise respond to Dav El's 18 Complaint by 32 days to Monday April 11, 2022, and to extend any early case deadlines by a 19 commensurate amount. 20 WHEREAS, Boeing removed this case from King County Superior Court on March 3, 21 2022 and, pursuant to Fed. R. Civ P. 81(c)(2)(C), Boeing's current deadline to move, plead, or 22 23 otherwise respond to the Complaint is March 10, 2022. WHEREAS, good cause exists to extend any early case deadlines, including Boeing's 24 deadline to answer or otherwise respond to Dav El's Complaint, by 32 days because the parties 25 are discussing a potential resolution of the litigation and the requested extension may allow the 26 Perkins Coie LLP STIPULATED MOTION AND [PROPOSED] ORDER TO EXTEND TIME – 1

1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Phone: 206.359.8000 Fax: 206.359.9000

1 parties to avoid the need to expend resources on filings that would be unnecessary if the parties 2 resolved this dispute. 3 WHEREAS, this stipulated motion is filed in good faith and not for the purposes of 4 delay, and will not alter any dates or schedules previously set by this Court. 5 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among 6 Boeing and Dav El, subject to the Court's approval, that the deadline for Boeing to move, plead, 7 or otherwise respond to Dav El's Complaint is extended by 32 days to April 11, 2022, and any 8 other early case deadlines should be extended by a commensurate amount. 9 10 11 12 DATED: March 4, 2022 s/ David A. Perez, WSBA No. 43959 s/ Ian Rogers, WSBA No. 46584 13 **Perkins Coie LLP** 1201 Third Avenue, Suite 4900 14 Seattle, WA 98101-3099 Telephone: 206.359.8000 15 Facsimile: 206.359.9000 E-mail: Dperez@perkinscoie.com 16 E-mail: Irogers@perkinscoie.com 17 Attorneys for Defendant The Boeing Company 18 s/ Gregory J. Hollon, WSBA No. 26311 19 s/ Claire Martirosian, WSBA No. 49528 McNaul Ebel Nawrot & Helgren PLLC 20 600 University Street, Suite 2700 Seattle, Washington 98101 21 Telephone: (206) 467-1816 Facsimile: (206) 624-5128 22 E-mail: ghollon@mcnaul.com E-mail: cmartirosian@mcnaul.com 23 Attorneys for Plaintiff DDSSBOS LLC d/b/a 24 Dav El/Boston Coach 25 26

STIPULATED MOTION AND ORDER TO EXTEND TIME – 2

Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Phone: 206.359.8000 Fax: 206.359.9000

92433403.2

1 **ORDER** 2 IT IS SO ORDERED 3 Dated this 7th day of March, 2022 Marshy Helens 4 5 Marsha J. Pechman 6 United States Senior District Judge 7 Presented by: 8 s/ David A. Perez, WSBA No. 43959 9 s/ Ian Rogers, WSBA No. 46584 Perkins Coie LLP 10 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Telephone: 206.359.8000 11 Facsimile: 206.359.9000 12 E-mail: Dperez@perkinscoie.com E-mail: Irogers@perkinscoie.com 13 Attorneys for Defendant The Boeing Company 14 15 s/ Gregory J. Hollon, WSBA No. 26311 s/ Claire Martirosian, WSBA No. 49528 16 McNaul Ebel Nawrot & Helgren PLLC 600 University Street, Suite 2700 17 Seattle, Washington 98101 Telephone: (206) 467-1816 18 Facsimile: (206) 624-5128 E-mail: ghollon@mcnaul.com 19 E-mail: cmartirosian@mcnaul.com 20 Attorneys for Plaintiff DDSSBOS LLC d/b/a Dav El/Boston Coach 21 22 23 24 25 26

Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Phone: 206.359.8000

Fax: 206.359.9000

92433403.2

TIME - 3

STIPULATED MOTION AND ORDER TO EXTEND